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Stephen M. Ryan
Attorney at Law
sryan@mwe.com
+1 202 756 8333

November 12, 2009

BY HAND DELIVERY

Jeff S. Jordan, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Matter Under Review 6215 (William Snyder)

Dear Mr. Jordan,

On behalf of our client, William Snyder, I am writing in response to Randy Spitzmesser's complaint filed with the Commission on September 28, 2009. By the Commission's letter dated October 20, 2009, the time for this response was extended to the close of business on November 19, 2009. As counsel for Mr. Snyder, I respectfully request that the Commission find no reason to believe a violation has occurred with respect to Mr. Snyder, and take no further action in this matter. See 2 U.S.C. § 437g(a)(1); 11 C.F.R. § 111.6(a).

Factual Background

Mr. Snyder is a Principal and Chairman of the Board at Tate Snyder Kimsey Architects, Ltd. ("TSK"), a Las Vegas, Nevada-based architectural design firm. (See Declaration of William Snyder ("Snyder Decl.") ¶ 1, Nov. 6, 2009.) He has worked for TSK since 1978, and is partially retired. (*Id.*)

In January 2009, Mr. Snyder's business partner, Windom Kimsey, invited Mr. Snyder to attend a fundraising luncheon event for United States Senator Harry Reid in Las Vegas, Nevada. (*Id.* ¶ 2.) The Reid event was held at Wolfgang Puck Café at the Las Vegas Springs Preserve in Las Vegas on February 17, 2009. (*Id.*)

Although he did not attend the fundraising event, Mr. Snyder contributed \$1,500 to Senator Reid's re-election campaign. (*Id.* ¶¶ 3-4.) He made the contribution using a personal American Express credit card, the balance for which he paid using personal earnings. (*Id.* ¶ 4.) Besides his financial contribution to the Reid campaign, Mr. Snyder was not involved in planning or organizing the Reid event. (*Id.* ¶ 5.)

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Mr. Snyder did not discuss with any individual the possibility of receiving a reimbursement for his or her contribution to the Reid event, nor did Mr. Snyder attempt to persuade individuals to contribute by threats regarding their employment at TSK, or contracts with the company. (*Id.* ¶¶ 6, 8.)

Response

Despite Mr. Spitzmesser's false allegations about Mr. Snyder, he did not violate any campaign finance laws or regulations. Mr. Snyder made his financial contribution to the Reid campaign after his business colleague, Mr. Kimsey, asked him to participate in the February 17 luncheon.¹ (*Id.* ¶¶ 2, 4.) Because Mr. Snyder is a supporter of Senator Reid, and had known the Senator through their mutual work on behalf of a non-profit organization, Mr. Snyder agreed to contribute to his re-election campaign. (*Id.* ¶ 3.)

Mr. Snyder's contribution was paid from his personal American Express account. (*Id.* ¶ 4.) Mr. Snyder uses only personal funds to pay his account balance, and did not receive any reimbursement for his contribution to the Reid campaign. (*Id.* ¶¶ 4, 7.) Although he contributed funds in support of the event, Mr. Snyder did not attend the Reid fundraiser. (*Id.* ¶¶ 3-4.)

Mr. Snyder also did not coerce, pressure, or threaten any individual to make a contribution to the Reid event – including Mr. Spitzmesser. (Compl. ¶¶ 2-3, Sept. 28, 2009, Snyder Decl. ¶¶ 8-9.) As set forth in the accompanying Declaration, Mr. Snyder denies making a "threatening statement" to TSK employees and subcontractors to force them to contribute to the Reid event, and he did not advise any individual that he or she may not "have any work for the upcoming year" for failure to contribute to the fundraiser. (Snyder Decl. ¶¶ 8-9.)

* * * * *

Because there is no factual basis for Mr. Spitzmesser's allegations against Mr. Snyder, we respectfully request that the Commission find no reason to believe he has committed a violation of federal campaign finance laws, and close the matter with no further action against him.

¹ As Chairman of the Board and a principal of TSK, Mr. Snyder was a member of the company's restricted class. See 11 C.F.R. § 114.1(j), 114.5(g). Accordingly, Mr. Kimsey did not facilitate the making of an unlawful contribution by asking Mr. Snyder to contribute directly to Senator Reid's candidate committee, which Mr. Snyder did using his personal American Express account. See § 114.5(f)(4)(ii).

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If you have questions or require additional information, please do not hesitate to contact me at (202) 756-8333.

Respectfully submitted,

 (Jel)
Stephen M. Ryan

(1) Enclosure

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